

December 13, 2010

Michael Berkoff
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Chicago, IL 60604



EPA Region 5 Records Ctr.



312127

Subject: Commentary of Draft FS for OU-1 of Allied Paper Inc/Portage Creek/Kalamazoo River Superfund Site

Dear Mr. Berkoff:

The Parks Foundation of Kalamazoo County has a keen interest in the cleanup remedy chosen for the former Allied Paper Co. (OU-1) site, part of the Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site located in the center of the City of Kalamazoo. This interest arises from the fact that the OU-1 site currently blocks a planned segment of the Kalamazoo River Valley Trail that is to connect with the Portage Bicentennial Park Trail.

Briefly, some background: The Parks Foundation of Kalamazoo County is a volunteer organization whose mission is to focus local and statewide resources on long-term development and promotion of the Kalamazoo County Parks. Currently its chief task is to oversee the planning, design, fundraising, marketing and use of the Kalamazoo River Valley Trail, a 35-mile long linear park which will connect bikeways already built in two neighboring counties to scenic and recreational areas within Kalamazoo County from D Avenue in the north to the Portage trail systems in the south. The Trail, Kalamazoo County's newest park, is being constructed in segments with funds provided by Michigan Department of Transportation and matching private and foundation contributions. It is now 40% complete, with the segment in question (Downtown Kalamazoo south along Portage Creek to Kilgore Road) to be built during the construction season of 2013 or 2014 if fundraising efforts continue to be successful. At Kilgore Road, this segment will join a trail in Portage which already enjoys wide use. MDOT is particularly interested in completing this segment because it will provide non-motorized means of commuting between the cities of Kalamazoo and Portage. Already, our infrared tracking system has shown significant use on those completed segments of the trail and we expect even more on this segment.

We at the Parks Foundation are concerned that cleanup activity at the Allied Site may interfere with this schedule. To the extent possible, we hope to coordinate our construction activity with the cleanup so that the two can proceed simultaneously. But we are much more concerned that a cleanup option could be chosen that would make impossible the passage of the trail through any part of the currently fenced-in area of the Allied Site even after cleanup is completed.



Since none of the options presented in the current draft of the Feasibility Study discuss any detail on location of off-limits areas remaining after cleanup, the Parks Foundation at this point prefers Option 3, Off-site Disposal, as the option that would allow the greatest freedom of use for all neighbors and visitors. Failing that, complete encapsulation of the waste soil (Option 4) is preferred, though we recognize that the time needed to complete that task could extend beyond 2014.

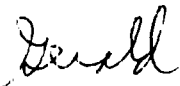
If one of the Options 2 (A or B) is chosen, we ask that easements be granted that would skirt the capped waste piles and that off-limits areas be made as small and unobtrusive as possible. Our first choice of trailway route through the Allied site is one that would pass over the Monarch HRDL location and follow the east bank of Portage Creek until it reaches the clay seam area, then crosses over the creek and runs parallel to the bank of the former Bryant Mill pond until it reaches Alcott Street.

A close second choice (less scenic and more hilly) would be a route that begins at the State-owned area fronting Cork Street and would pass roughly NNE, skirting the current Western Disposal Area on the west and the former Bryant HRDL/FRDLs to the east to connect with the access road that goes south from Alcott Street.

In summary, the Parks Foundation wishes to record its strong desire to have the Allied site, (OU-1) returned to usability as a natural habitat completely accessible for passive recreation. We want very much to have a cooperative relationship that will allow us to work together with the trustee to design the layout and grading of the remediated topography so as to minimize cost and maximize visitor safety and enjoyment when the site is restored.

The Kalamazoo River Valley Trail in its completed segments is proving to be very popular and as new segments are added and more people become aware of their beauty and accessibility, its utilization will greatly increase in the years to come. If we think of the KRV Trail as a necklace, with each segment being a strand of that necklace, then the restored Allied Site could be a pearl in one of those strands, equal in aesthetics to those portions of the trail that pass through more rural settings. The added attraction at this site could be the demonstration to trail riders and the general public that land once rendered hazardous to human health by past industrial activity can be restored to beauty and to productive use.

Yours truly,



Gerald Albertson
President, Parks Foundation of Kalamazoo County



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